

**U.S. DISTRICT COURT
DISTRICT OF NEBRASKA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZHIJUN XIA,

Defendant.

Case No. 4:20 CR 3062

**MOTION FOR DEPARTURE AND/OR
VARIANCE AND DEFENDANT'S
WRITTEN STATEMENT OF HIS
POSITION RESPECTING EACH OF
THE UNRESOLVED OBJECTIONS TO
THE PRESENTENCE REPORT**

COMES NOW the Defendant, by and through his attorney Steve Lefler, and, even though the undersigned does not think it is necessary given the pending plea agreement with the government, moves the Court for a departure and/or variance from the guidelines, which position will be set forth more fully in his brief.

The Defendant specifically objects to and will address paragraphs 27, 36, 37, and 47; paragraph 38; paragraph 41, 43, and 48; paragraphs 75-77; 80, and 95-97, again which will be developed in the accompanying brief.

ZHIJUN XIA, Defendant

By: /s/ Steve Lefler
Steve Lefler #15434
Matthew Burns, #25437
1213 JONES St.
Omaha, Nebraska 68102
(402) 342 4433
Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was forwarded to the parties by way of First Class Mail, E-mail and/or Electronic Service on JUNE 30, 2021.

/s/ Steve Lefler

Steve Lefler